

Steven S. Biss

From: "Steven S. Biss" <stevenbiss@earthlink.net>
Date: Wednesday, July 11, 2018 10:52 AM
To: "Susan A. Lutzke" <phz@tutanota.com>
Cc: "Terry C. Frank" <tcfrank@kaufcan.com>; "Johan Conrod" <rjconrod@kaufcan.com>; "Jason Goodman" <truth@crowdsourcethetruth.org>; "Jason Goodman" <jasongoodman72@protonmail.com>; "Robert Steele" <robert.david.steele.vivas@gmail.com>
Attach: Summons and Complaint - Lutzke.pdf; Evidence Preservation Letter - Lutzke - 7.11.18.pdf
Subject: Steele - Goodman (Case 3:18-cv-601-MHL) (E.D. Va.)

Ms. Lutzke,

Good morning.

Attached in PDF is a copy of the Summons and Complaint that was posted at the front door of your usual place of abode yesterday.

Our private process server is preparing his detailed Affidavit of Service, which I will email to you upon receipt.

As you well know, you have 21 days to file your response to Plaintiffs' Complaint.

This email notifies you that if you fail to respond within 21 days, I will request the Clerk to enter your default pursuant to Rule 55 of the Federal Rules of Civil Procedure, and I will, thereafter, file a motion seeking the entry of a default judgment against you.

Finally, attached in PDF is an Evidence Preservation Letter. You are directed to preserve intact all computer hard-drives (including desktop, laptop, iPad and phones). Please do not delete any files from your computers, as I will be seeking an Order to inspect your computers, including hard-drives, for communications with your co-Defendants that are relevant to the claims made in Plaintiffs' Amended Complaint.

You have a duty to preserve evidence. Spoliation may subject you to sanctions by the Federal Court.

I strongly encourage you to engage legal counsel to represent you in this matter.

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